

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND**

<b>United States of America,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 25-CR-00006-LKG</b>
	)	
<b>THOMAS C. GOLDSTEIN,</b>	)	
<b>Defendant.</b>	)	

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**JOHN DOE 2'S MOTION TO QUASH SUBPOENA TO TESTIFY  
AT A HEARING OR TRIAL IN A CRIMINAL CASE**

JOHN DOE 2 ("DOE 2"), by and through his undersigned counsel, hereby moves this Court, pursuant to Federal Rule of Criminal Procedure 17(e)(2), to quash the subpoena to testify at a hearing or trial in a criminal case allegedly served upon him on October 16, 2025 by email, because:

1. The subpoena was improperly served by email on October 16, 2025, without personal delivery as required under Federal Rule of Criminal Procedure 17(d), rendering the service defective and the subpoena unenforceable.
2. The subpoena commands Mr. DOE 2's attendance at a hearing or trial in Greenbelt, Maryland, which is more than 100 miles from his residence in California, rendering compliance unreasonable and oppressive under Federal Rule of Criminal Procedure 17(e)(2) and analogous principles under Federal Rule of Civil Procedure 45(c)(1)(A).
3. The subpoena creates an undue burden due to a scheduling conflict during the week of January 13, 2026, when Mr. DOE 2 has pre-existing professional commitments that cannot be reasonably accommodated.

In addition, Mr. DOE 2's counsel has had conversations with the Government's lawyer, which led Mr. DOE 2's counsel to believe there is a constitutional issue with the statement gathered from Mr. DOE 2.

For the reasons set forth herein and in the attached Memorandum in Support of Motion to Quash, Mr. DOE 2 respectfully requests that this Honorable Court quash the subpoena in its entirety.

Respectfully submitted,

/s/ Elizabeth Hughes  
Elizabeth Hughes  
Bar No. 22653  
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**Date:** December 15, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of December, 2025, a true and correct copy of the foregoing Motion was served via CM/ECF electronic service on all counsel of record,

including:

Adeyemi Adenrele  
Assistant United States Attorney  
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/s/ Elizabeth Hughes  
Elizabeth Hughes